

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-73 through 76]]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

To the extent that these new Library References replace a previous Library Reference, the questions contained in Interrogatory DBP/USPS-62 should be responded to if they apply to both the original and replacement Library References and should be responded to.

September 9, 2011

Respectfully submitted,

N20111N73

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-73 Please refer to your Library Reference USPS-LR-N2011-1/12 and the corresponding non-public version NP7.

[a] Please explain how the distances were calculated.

[b] Is the distance shown the distance FROM the facility being discontinued TO the replacement facility or is it the reverse? There appears to be different distances due to one way streets,

[c] If the nearest replacement office was originally calculated using airline distances, has it been reevaluated to see that it is still the nearest facility when the distances have been converted to driving distances? If not, why not?

[d] I have checked two entries in the Library Reference using [www.mapquest.com](http://www.mapquest.com) and I arrived at different distances than shown in the Library Reference.

Englewood Annex 07631 [55 Smith Street] to Englewood Main Office 07631 [77 Engle Street] = Mapquest 1.17 / 1.26 reverse miles / Library Reference 0.9 miles

River Road Fair Lawn 07410 [12-44 River Road] to Fair Lawn Main Office 07410 [14-24 Abbott Road] = Mapquest 1.11 miles / Library Reference 0.1 miles

Please explain the discrepancy for these two entries and please discuss the validity of the remaining entries.

DBP/USPS-74 Please refer to your Library Reference USPS-LR-N2011-1/13 and the corresponding non-public version NP8.

[a] Please advise the method by which the entries have been sorted.

[b] The entries do not appear to be consistently correct. For example, on page 52 it shows entries for PM Central Islip / Fort George / PVD-Cranston Finance Unit as being in the Northern NJ PFC when they are located in NY, NY, and RI.

Please explain what appears to be an obvious error in these three entries and also please discuss the validity of the remaining entries.

[c] Please explain the criteria for an office being categorized in each of the CAG levels.

DBP/USPS-75 Please refer to your Library Reference USPS-LR-N2011-1/14 and the corresponding non-public version NP9. This Library Reference appears to be in four sections.

SECTION ONE      Post Office Box Usage  
SECTION TWO      Waiting List Count  
SECTION THREE    Retail Window Count  
SECTION FOUR     Manpower Usage

- [a]      SECTION ONE              Please provide a listing of the column heading in 12 point type.
- [b]      SECTION ONE              Please explain what each of the column headings represent.
- [c]      SECTION ONE              Please advise the method by which the entries have been sorted.
- [d]      SECTION TWO              Please advise the method by which the entries have been sorted.
- [e]      SECTION THREE              Please advise the method by which the entries have been sorted.
- [f]      SECTION FOUR              Please advise the method by which the entries have been sorted.
- [g]      SECTION FOUR              Please explain what each of the column headings represent.
- [h]      SECTION FOUR              Please provide a listing of what each of the entries in all of the columns except the first two stands for.

DBP/USPS-76      In the hearing before the United States Senate Committee on September 6, 2011, the Postmaster General stated several times that the revenue cutoff for use in the current Docket was \$20,000 rather than the \$27,500 figure that was previously provided by the Postal Service. Does this require the filing of updates by the Postal Service as required by the Commission's Rules? If not, what was the significance of his testimony?